

ABELSON & TRUESDALE, LLC

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Attorney for Debtors

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In Re:

MOHAMED MOHAMED

Debtor

:
:
: Case No. 18-23027
:
: Chapter 13
:
: Hearing Date: November 13, 2018
:
: Judge: Hon. Michael B. Kaplan

**COUNSEL'S CERTIFICATION IN RESPONSE TO TRUSTEE'S OBJECTION TO
CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN**

Michael M. Khalil, counsel to the Debtor, submits the following in response to the Trustee's objection to confirmation of the Debtor's proposed chapter 13 plan:

1. I am attorney at law of the State of New Jersey, this District, an associate of the above law firm and have been tasked with the representation of the Debtor in this matter.

2. The Debtor is in receipt of the Trustee's filed objection to confirmation (Docket # 15) which alleges that the Debtor is not properly treating leased vehicles in his plan or his schedules.

3. The Debtor respectfully submits that his treatment of the previously leased vehicles both in his plan and on his schedules is proper. The vehicles in questioned were repossessed pre-petition, they were included on Schedule F of the Debtor's petition and the Debtor's plan properly rejects the same.

4. Furthermore, the Debtor acknowledges the Trustee's objection with respect to the existence of a liquidation threshold and respectfully submits that the proposed plan payment would yield a dividend to unsecured creditors which is in excess of the threshold per the Trustee's objection.

WHEREFORE, the Debtor respectfully requests that the Court confirm his plan as proposed.

/s/ Michael M. Khalil.
Michael M. Khalil, Esq.
Attorney for Debtor